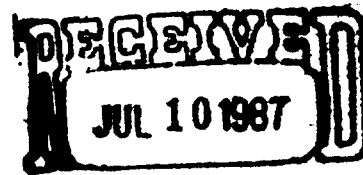




217/782-6761

Refer to: 1631210008 -- St. Clair County
Sauget/Cerro Copper Products Co.
ILD080018914
Compliance File



BY P. T.

COMPLIANCE INQUIRY LETTERCertified # *P594561810*

July 8, 1987

Cerro Copper Products Co.
Attn: Mr. Paul Tandler, Vice President of Manufacturing
P.O. Box 681
East St. Louis, Illinois 62202

Dear Mr. Tandler:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code Part 722, Subparts A, B, C and D and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance in Attachment A are based on an inspection completed on June 2, 1987. For your convenience a copy of the inspection report is enclosed with this letter.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations, a description of the steps which have been taken to correct the violations and a schedule, including dates, by which each violation will be resolved. The written response, and two copies of all documents submitted in reply to this letter, should be sent to the following:

Harry A. Chappel, P.E., Acting Manager
Facilities Compliance Unit
Compliance Monitoring Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

At the time of the inspection, the apparent violation of Section 722,134(a) was resolved. Therefore, a written response is not required.



Page 2

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.

If you have any questions regarding the above, please contact Randy Ballard at 618/345-4606.

Sincerely,

A handwritten signature in cursive script, appearing to read "Harry A. Chappel".

Harry A. Chappel, P.E., Acting Manager
Facilities Compliance Unit
Compliance Monitoring Section
Division of Land Pollution Control

HAC:BF:jd/3038g/31

cc: Division File
Southern Region
Bruce Carlson
Randy Ballard
Bur Filson



Attachment A

1631210008 - St. Clair County - Sauget/Cerro Copper Products - ILD080018914

Pursuant to 35 Ill. Adm. Code 722.134(a), except as provided in Subsections (d), (e) or (f), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that:

1. The waste is placed in containers and the generator complies with 35 Ill. Adm. Code 725 Subpart I (Use and Management of Containers) or the waste is placed in tanks and the generator complies with 35 Ill. Adm. Code 725 Subpart J (Tanks) except 35 Ill. Adm. Code 725.293;
2. The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;
3. While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste", and
4. The generator complies with the requirements for owners or operators in 35 Ill. Adm. Code 725 Subparts C (Preparedness and Prevention) and D (Contingency Plan and Emergency Procedures) and with 35 Ill. Adm. Code 725.116 (Personnel Training).

You are in apparent violation of 35 Ill. Adm. Code 722.134(a) in that item 3 above was not complied with.

RDB:jlr/0189L

*NOT A WASTE PRODUCT. MATERIAL
WAS SPENT SOLVENT, SENT FOR
RE-PROCESSING.*

*P.T.
7/10/87*

INSPECTION REPORT

IEPA Number: 1631210008

[illegible]

Operator: Cerro Copper Products Telephone # (618) 337-6000

Street: P.O. Box 681

City: East St Louis State: Ill. Zip Code: 62202

Owner: Cerro Copper Products Telephone # (618) 337-6000

Street: P.O. Box 681

City: East St Louis State: Ill. Zip Code: 62202

Person Interviewed _____ Title _____ Telephone # _____

Inspection Participants _____ Agency/Title _____ Telephone # _____

Randy Ballard IEPA / LSC (615) 345-4600

Mike E. Grant IEPA / EPS-2 (615) 345-4600

Prepared By _____ Agency/Title _____ Telephone # _____

Randy Ballard & Mike Grant IEPA / LSC & EPS-2 (615) 345-4600

Summary of Apparent Violations

Area	Class	Section
Oth	1	722.134(c)

Area	Class	Section

Area	Class	Section

RECEIVED

JUN 24 1987

150A M100

WASTE DISP

Facility Name:

Cerro Copper Products

USEPA #: C80018714

IEPA #: 16313

ИЕРА №: 163/22-100018

[illegible]

RECEIVED
JUN 24 1987
1104-101-5

REMARKS

Cerro Copper is a copper refinery. The facility consists of two manufacturing operations which produce copper cathode and copper tubing. Cerro Copper uses copper-bearing scrap and virgin copper by-products which are generated as a result of refining operations and are either reused on-site or shipped off-site to other reclaiming facilities. Furnace slag generated at Cerro is shipped to Chemetco (ILD048843809) where it is used as furnace feed and reclaimed copper is returned to Cerro. The facility operates a wet scrubber on each of its furnaces. The trapped metal particles are then introduced back into the furnace. The facility also generates spent solvent at a number of finishing stands. The solvent is used to remove particles and oil from finished copper tubing. The facility also operates a vapor degreaser. The vapor degreaser is used on tubing which has to be oil free, i.e. tubing used for oxygen or air conditioning. There are two distillation units at the facility used to reclaim these solvents.

The only hazardous waste shipped from Cerro Copper is the still bottoms (F001) from recovery of the solvents. During this inspection there were five drums of still bottoms on-site. The still associated with the vapor degreaser operates continuously recirculating the distilled solvent. We observed the still bottoms area. Five drums were stored in this area which were properly labelled and marked with accumulation dates. Waste oil is shipped to Gateway Petroleum.

Since the previous inspection on April 21, 1987, a 1600 gallon tank is now used to accumulate spent solvent which feeds the spent solvent into the still.

The paperwork was reviewed and no deficiencies were noted. Representing Cerro Copper were Sandy A. Silverstein, Manager of Engineering and Bake Ottofy III, Safety Director.

No cameras are allowed on-site. This issue was not pursued as the site appeared to be well run. Mike Grant also completed a RCRA Land Restriction F-Solvent Generator Checklist for submittal to the USEPA.

RDB:jl1r/22

The apparent violation of 722.134(c) for not having all containers labeled "Hazardous Waste" was corrected during my inspection.
R.B. by
BB 6/24/87

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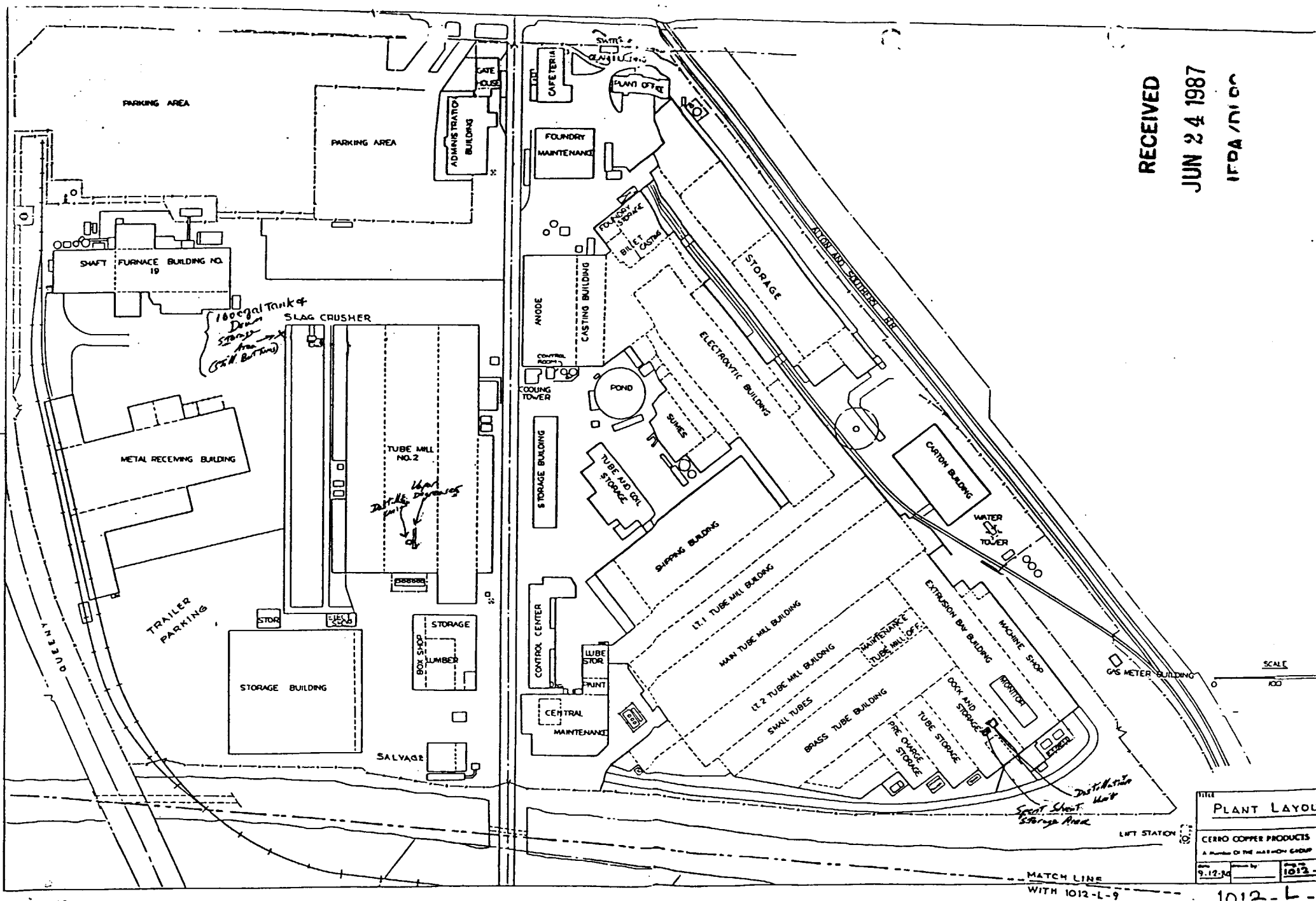
JUN 24 1987

150A / DI SC

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JUN 24 1987

IFDA/NIGC



TITLE	
PLANT LAYOUT	
CERRO COPPER PRODUCTS CO.	
A Member of the MARYON GROUP	
DATE	BY
9-12-84	1012-L

1012-L-